## Minnesota Department of Natural Resources

500 Lafayette Road • St. Paul, MN • 55155-4037

January 20, 2006



Mr. Don Hultman
Upper Mississippi River NW&FR
Attn: CCP Comment
Room 101
51 East Fourth St
Winona, Minnesota 55987

Dear Mr. Hultman:

The Minnesota Department of Natural Resources would like to reiterate our support for the US Fish and Wildlife Service in developing a comprehensive and diverse plan for management of the Upper Mississippi River National Wildlife and Fish Refuge over the next 15 years. We believe Alternative E, similar to Alternative D, continues to focus on the six fundamental uses of the Refuge and should drive management and use of the system. We believe the issues generated during your initial scoping meetings, and subsequent public input, identified the variety of uses and experiences sought by the public and are reflected in Alternative E.

We continue to strongly support your desire to improve habitat and water quality and your recommendations which included increased rate of land acquisition, bluffland protection, decreased sedimentation, Pool-scale drawdowns, control of invasive plants and animals, increased inventory and monitoring, and threatened and endangered species recovery. Many of our suggested changes (from our August 31, 2005 letter on Alternative D) have been incorporated into the new Alternative E. These actions should be the highest priority of the final plan, and we will continue our strong partnership with the USFWS and other agencies, NGOs, and the public to complete these activities.

We understand the complexity and variety of issues and concerns you are addressing regarding public use. Alternative E, while including fewer limited entry areas than we had recommended in Alternative D, does provide opportunities for a variety of users, including some non-motorized and slow-no wake areas, and provides much needed areas of minimal disturbance.

Providing refuge areas for migrating waterfowl is an important component of our recently released statewide waterfowl management plan. We support the Closed Areas identified in Alternative E and encourage you to monitor those areas for disturbances during the waterfowl season, and if necessary implement further restrictions to minimize disturbances.

We remain concerned about enforcement impacts and the level of USFWS staffing that will be available to enforce the new restrictions. The step-down enforcement plan recommended in Alternative E should address the issues identified in our August 31, 2005 letter and should be developed in conjunction with Minnesota DNR staff before a final Comprehensive Plan is implemented. Specifically, we request information on a schedule, issues to be addressed, and how Minnesota DNR staff will be involved in developing this plan.

In summary, we appreciate the opportunity to comment on Alternative E and the efforts you have taken to include other partners and the public in the planning process. We strongly support Alternative E, assuming a step-down enforcement plan is developed in conjunction with Minnesota DNR enforcement staff. Please contact me or Tim Schlagenhaft (507-280-5058) of my staff if you have any questions regarding our comments and recommendations.

Sincerely,

Gend Merriam
Commissioner

Attachment

c: John Halverson, Office of Senator Norm Coleman